

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

**MICHAEL RUSSIN, RUSSIN
FINANCIAL, RUSSIN GROUP, SIMON
ARIAS, III, ARIAS AGENCIES, S.A.
ARIAS HOLDINGS, LLC, AMERICAN
INCOME LIFE INSURANCE COMPANY,**

ELECTRONICALLY FILED

Defendants.

**DECLARATION OF JEFFREY HAMMER IN SUPPORT OF
DEFENDANT AMERICAN INCOME LIFE INSURANCE COMPANY'S
OBJECTION TO SETTLEMENT AGREEMENT**

Jeffrey M. Hammer, under the pains and penalties of perjury, states:

1. I am an attorney admitted to practice in the State of California. I am an attorney at King & Spalding LLP, counsel for Defendant American Income Life Insurance Company ("AIL"), and am admitted Pro Hac Vice in the above-referenced matter. I submit this declaration in support of AIL's Objection to Settlement Agreement. I have personal knowledge of the facts stated herein, and could and would testify competently thereto if called as a witness in this matter.
2. On September 27, 2022, Plaintiff Renee Zinsky filed a Demand for Arbitration ("Demand") with the American Arbitration Association against AIL, Simon Arias, Arias Agencies, and S.A. Arias Holdings, LLC.
3. In Zinsky's Demand she asserted that she been misclassified as independent contractor and had, as a matter of law, been an employee since the inception of her relationship with AIL.

4. On September 10, 2023, Russin testified at a deposition noticed by Zinsky in the arbitration.

5. Attached hereto as **Exhibit A**, is a true and correct copy of a document I received on April 16, 2024, through the Case Management/Electronic Case Files (CM/EFC) system, as ECF No. 145 in the above-captioned action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was signed on April 24, 2024 in Pasadena, California.

/s/ Jeffrey M. Hammer
Jeffrey M. Hammer